

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

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(916) 322-5662

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322-5660

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322-5901

• • Enforcement  
322-6441

July 3, 1985

Victoria Cable  
Assistant to the Director  
Gilchrist-Ross Associates  
1127 11th Street, Ste. 1003  
Sacramento, CA 95814

Re: Our File No. A-85-143

Dear Victoria:

Thank you for your letter of June 17, 1985, requesting confirmation of my advice concerning the lobbying disclosure reports filed by Robert E. Ross pursuant to the Political Reform Act (Gov. Code Sections 81000-91015). During our telephone conversation of June 5, 1985, you had asked whether Mr. Ross should amend his 1984 reports to reflect that he is employed by the lobbying firm of Gilchrist-Ross Associates.

You explained that although Mr. Ross is employed by Gilchrist-Ross Associates, John Gilchrist was not actively associated with the firm during 1984 and upon resolution of some legal matters, Mr. Ross will be the sole proprietor of the firm. During 1984, Mr. Ross was the only lobbyist employed by the firm, and he filed Lobbyist Reports (Form 620) disclosing all of the payments received by Gilchrist-Ross Associates as if the payments were received by him directly. Each of the firm's clients filed a Report of Lobbyist Employer (Form 650) which also showed direct payments to Mr. Ross. Gilchrist-Ross Associates filed no employer reports for 1984.

I advised you that because all of the payments received by the firm during 1984 were fully disclosed on Mr. Ross' Form 620, and because Commission regulations now allow a lobbyist who wholly owns a business entity and who is the only lobbyist employed by the entity to disclose all activities of the lobbyist and the entity on the Form 620 (2 Cal. Adm. Code Section 18614--copy enclosed), there is no need to file employer reports for Gilchrist-Ross Associates for 1984 or to amend Mr. Ross' 1984 reports. However, I also advised you to review Mr. Ross' filings to ensure that all payments made by the firm were included as General Lobbying Expenses (Part III, Section B). If amendments are needed

# GILCHRIST-ROSS ASSOCIATES

## LEGISLATIVE RELATIONS

11th and L Bldg.  
Sacramento, Calif. 95814  
447-4068

June 17, 1985

Ms. Carla Wardlow  
FPPC  
1100 K Street  
Sacramento, CA 95814

Dear Carla;

Thank you so much for your help regarding the 620's  
for Robert E. Ross and the 650's for Gilchrist-  
Ross Associates.

As we discussed:

1. John Gilchrist does not lobby for  
Gilchrist-Ross Associates.
2. Robert E. Ross is the sole lobbyist  
for Gilchrist-Ross Associates.
3. Robert E. Ross has reported all money  
received for Gilchrist-Ross Associates  
on his 620's.

Therefore, this letter is to confirm your advice  
that Gilchrist-Ross Associates need not send in  
quarterly 650's for Gilchrist-Ross Associates  
because all income is reported on Robert E. Ross'  
620's.

Please send me confirmation if the above accurately  
reflects our conversation.

Thank you again,

Victoria J. Cable  
Assistant to the Director  
Gilchrist-Ross Associates

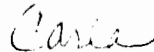
VJC:gw

Victoria Cable  
July 3, 1985  
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for the purpose of including the firm's payments, you should also amend the reports to identify both Gilchrist-Ross Associates and Robert Ross as outlined in the enclosed FPPC fact sheet which clarifies regulation Section 18614. I also advised you to review the reports filed for 1983 to ensure that all activities were properly disclosed.

Please let me know if I can be of further assistance in this matter.

Sincerely,



Carla Wardlow  
Political Reform Consultant

Enclosures